



October 3, 2023

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Courtroom 20C
New York, New York 10007

Re: *Doe v. Black*, Case No. 1:23-cv-06418-JGLC

Dear Judge Clarke,

I write on behalf of Defendant Leon D. Black in connection with my previous correspondence dated September 22, 2023 (ECF No. 37). After consulting with Plaintiff's counsel regarding redactions, Defendant publicly filed a partially redacted Rule 11 Motion (ECF No. 30). Plaintiff, seeking to seal this motion in its entirety, submitted an emergency application to the ECF Help Desk which resulted in the clerk's office sealing Defendant's Rule 11 motion pending a formal application to Your Honor regarding redactions, which Plaintiff filed on September 21 (ECF No. 35).

At the first opportunity, I wrote to the Court explaining that Plaintiff's proposed redactions to the filing should be denied, and public access to the redacted filings should be restored. Now, I write to inquire whether the Court is awaiting additional briefing from the parties prior to determining appropriate redactions and unsealing Defendant's Rule 11 motion.

Sincerely,

ESTRICH GOLDIN, LLP

/s/ Susan Estrich
Susan Estrich

cc: counsel of record via ECF